

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA, <i>ex rel.</i> INTEGRA MED ANALYTICS LLC, Plaintiff, v. ISAAC LAUFER, <i>ET AL</i> , Defendants.	Case No. 17 Civ. 9424 (CS)
UNITED STATES OF AMERICA, Plaintiff, v. ISSAC LAUFER, <i>ET AL</i> , Defendants.	

NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of law in Support of its Motion to Dismiss the Complaint dated October 28, 2021, Defendant Paragon Management SNF LLC will move this Court, before the Honorable Cathy Seibel, United States Judge for the Southern District of New York, on a date to be determined by the Court for an Order to Dismiss the Government's Complaint-in-Intervention (Docket No. 13) under Fed. R. Civ. P. Rules 8, 9(b), and 12(b)(6) and that the claim is in part barred by the applicable statute of limitations.

Dated: Pound Ridge, NY
 October 28, 2021

Respectfully submitted,

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